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## Proposed Attorneys for Chapter 11 Debtor and Debtor-in-Possession

**UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SANTA ANA DIVISION**

In re:  
THE SOURCE HOTEL, LLC, a  
California limited liability company,  
  
Debtor and Debtor in Possession.

Case No.: 8:21-bk-10525-ES

Chapter 11

**NOTICE OF APPLICATION OF DEBTOR  
AND DEBTOR IN POSSESSION TO  
EMPLOY LEVENE, NEALE, BENDER,  
YOO & BRILL L.L.P. AS BANKRUPTCY  
COUNSEL**

[No Hearing Required – Local Bankruptcy Rule 2014-1(b)]

1       **PLEASE TAKE NOTICE** that The Source Hotel, LLC, a California limited liability  
2 company (the “Debtor”), the debtor and debtor in possession in the above-captioned chapter 11  
3 bankruptcy case, has filed an application (the “Application”) for Court approval of the Debtor’s  
4 employment of Levene, Neale, Bender, Yoo & Brill L.L.P. (“LNBYB”) as bankruptcy counsel,  
5 effective as of February 26, 2021 (the date that the Debtor filed its voluntary chapter 11 petition),  
6 upon the terms and conditions described below and in the Application.

7       **PLEASE TAKE FURTHER NOTICE** that the Debtor is the developer of a full-service  
8 seven-story hotel with 178 rooms in the City of Buena Park, County of Orange, State of  
9 California (the “Hotel”), which will include conference rooms, an executive lounge, fitness  
10 center, restaurant, bars, and cleaning services. The Hotel is part of a larger 12.8-acre mixed-use  
11 development project, which includes a 400,000 square-foot retail center and a 50,000 square-foot  
12 seven-story office building which were completed in 2016. The Debtor does not own the real  
13 property on which the Hotel is being constructed, but is a lessee pursuant to a 99-year ground  
14 lease for such real property with the Debtor’s affiliate, The Source at Beach, LLC.

15       **PLEASE TAKE FURTHER NOTICE** that LNBYB will bill its time for its  
16 representation of the Debtor on an hourly basis in accordance with LNBYB’s standard hourly  
17 billing rates, and will seek reimbursement of expenses in accordance with the rates set forth in the  
18 guidelines promulgated by the Office of the United States Trustee.

19       **PLEASE TAKE FURTHER NOTICE** that, to the best of LNBYB’s knowledge and  
20 based upon the Declaration of Juliet Y. Oh, Esq. submitted in support of the Application, LNBYB  
21 and all attorneys associated with LNBYB who expect to render services in the Debtor’s case are  
22 “disinterested persons” as that term is defined in Section 101(14) of the Bankruptcy Code, and do  
23 not hold or represent any interest adverse to the Debtor or its bankruptcy estate. To the best of  
24 LNBYB’s knowledge, LNBYB has no prior connection with the Debtor, any creditor of the  
25 Debtor or its estate, or any other party in interest in the Debtor’s case, or their respective attorneys  
26 or accountants, the United States Trustee or any person employed by the United States Trustee.

1           **PLEASE TAKE FURTHER NOTICE** that LNBYB agreed to accept a retainer in the total  
2 sum of \$100,000.00 for legal services in contemplation of and in connection with the Debtor's  
3 chapter 11 case. During the one-year period prior to the Petition Date, the Debtor paid the total sum  
4 of \$100,000.00 to LNBYB. These payments constituted pre-bankruptcy retainers for legal services  
5 in contemplation of and in connection with the Debtor's chapter 11 case (collectively, the  
6 "Retainer"), which Retainer is in addition to the Debtor's chapter 11 bankruptcy filing fee, which  
7 the Debtor paid to LNBYB, and which LNBYB in turn paid to the Clerk of the Court. LNBYB is  
8 advised and believes that the Retainer and filing fee were paid with funds advanced to the Debtor by  
9 M+D Properties, which is the non-member Manager of the Debtor. Except as described above and  
10 in the Application, LNBYB has not been paid any other money by the Debtor at any other time.  
11 LNBYB will place the unused portion of the Retainer as of the Petition Date into a segregated  
12 account and draw down from those funds on a monthly basis in accordance with the common  
13 procedures of this District to assist LNBYB with its cash flow needs, recognizing that all post-  
14 petition fees and expenses paid to LNBYB must be ultimately approved by the Court after notice  
15 and a hearing.

16           **PLEASE TAKE FURTHER NOTICE** that LNBYB has not been paid any money by the  
17 Debtor or any other entity at any time other than the Retainer in the sum of \$100,000.00 described  
18 above. LNBYB has not received any lien or other interest in property of the Debtor or of a third  
19 party to secure payment of LNBYB's fees or expenses.

20           **PLEASE TAKE FURTHER NOTICE** that any request for a copy of the Application  
21 must be made in writing to Levene, Neale, Bender, Yoo & Brill L.L.P., 10250 Constellation  
22 Blvd., Suite 1700, Los Angeles, California 90067, Attention: Juliet Y. Oh, Email:  
23 JYO@LNBYB.com.

24           **PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Bankruptcy Rule 2014-  
25 1(b)(3)(E), any objection to and request for a hearing on the Application, in the form required by  
26 Local Bankruptcy Rule 9013-1(f)(1), must be filed and served on the Debtor, LNBYB and the  
27 Office of the United States Trustee within fourteen (14) days after the date of service of this  
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1 Notice plus three (3) additional days if served by mail, electronically, or pursuant to Rule  
2 5(b)(2)(D), (E), or (F) of the Federal Rules of Civil Procedure and Rule 9006 of the Federal  
3 Rules of Bankruptcy Procedure.

4 **PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Bankruptcy Rule 2014-  
5 (b)(4), if no objection and request for a hearing on the Application is timely filed and served,  
6 LNBYB will promptly lodge a proposed order approving the Application.

7 Dated: March 10, 2021

8 LEVENE, NEALE, BENDER, YOO  
9 & BRILL L.L.P.  
10 

11 By: \_\_\_\_\_  
12 Ron Bender  
13 Juliet Y. Oh  
14 Proposed Counsel for Chapter 11 Debtor  
15 and Debtor in Possession

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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 10250 Constellation Boulevard, Suite 1700, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled **NOTICE OF APPLICATION OF DEBTOR AND DEBTOR IN POSSESSION TO EMPLOY LEVENE, NEALE, BENDER, YOO & BRILL L.L.P. AS BANKRUPTCY COUNSEL** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **March 10, 2021**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Ron Bender rb@lnbyb.com
- Nancy S Goldenberg nancy.goldenberg@usdoj.gov
- Daniel A Lev dlev@sulmeyerlaw.com, ccaldwell@sulmeyerlaw.com;dlev@ecf.inforuptcy.com
- Grant A Nigolian grant@gnpclaw.com, process@gnpclaw.com;grant.nigolian@gmail.com
- Juliet Y Oh jyo@lnbrb.com, jyo@lnbrb.com
- Ho-El Park hpark@hparklaw.com
- Ronald N Richards ron@ronaldrichards.com, morani@ronaldrichards.com,justin@ronaldrichards.com
- United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov

**2. SERVED BY UNITED STATES MAIL:** On **March 10, 2021**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **March 10, 2021**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

None.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

March 10, 2021

Date

Stephanie Reichert

Type Name

/s/ Stephanie Reichert

Signature

The Source Hotel, LLC  
OUST, Secured, Top 20, RSN

United States Trustee (SA)  
411 W Fourth St., Suite 7160  
Santa Ana, CA 92701-4500

**Secured Creditors:**

3D Design - Millwork  
8152 Indianapolis Ave.  
Huntington Beach, CA 92646

Aragon Construction, Inc.  
5440 Arrow Highway  
Montclair, CA 91763

Beach Orangethorpe II, LLC  
P.O. Box 489  
Buena Park, CA 90621

Beach Orangethorpe III, LLC  
P.O. Box 489  
Buena Park, CA 90621

Beach Orangethorpe, LLC  
P.O. Box 489  
Buena Park, CA 90621

Beachamp Distributing Co.  
1911 South Santa Fe Avenue  
Compton, CA 90221

Best Quality Painting  
818 N. Pacific Ave., #C  
Glendale, CA 91203

Certified Tile  
14557 Calvert St.  
Van Nuys, CA 91411

Evergreen Electric Construction  
629 Grove View Lane  
La Canada, CA 91011

Iron Mechanical  
721 North B Street  
Suite 100  
Sacramento, CA 95811

KS Steel Corp.  
1748 Industrial Way  
Los Angeles, CA 90023

Nemo & Rami  
1930 W. Holt Ave.  
Pomona, CA 91768

Northstar  
404 North Berry Street  
Brea, CA 92821-3104

Pan Pacific  
18250 Euclid Street  
Fountain Valley, CA 92708

PDG Wallcoverings  
26492 Via Juanita  
Mission Viejo, CA 92691

Prime Concrete Coatings  
6127 James Alan St.  
Cypress, CA 90630

Resco Electric Inc.  
2431 W. Washington Blvd. Suite B  
Los Angeles, CA 90018

Retrolock Corp  
17915 Railroad Street  
City of Industry, CA 91748

Salamander Fire Protection, Inc  
6103 Tyrone Street  
Van Nuys, CA 91401

Shady Bird Lending, LLC  
c/o Law Offices of Ronald Richards  
P.O. Box 11480  
Beverly Hills, CA 90213

Solid Construction  
883 Crenshaw Blvd.  
Los Angeles, CA 90005

Sunbelt Controls, Inc.  
888 E. Walnut Street  
Pasadena, CA 91101

Grant Nigolian, P.C.  
695 Town Center Drive, Suite 700  
Costa Mesa, CA 92626

Hunt Ortmann Palffy Nieves et al.  
301 North Lake Avenue, 7th Floor  
Pasadena, CA 91101-1807

Law Office of Ho-El Park, P.C.  
333 City Blvd. West, Suite 1700  
Orange, CA 92868

Law Office of Michael N. Berke  
25001 The Old Road  
Santa Clara, CA 91381

Law Offices of Dennis G. Cocco  
345 Oxford Drive  
Arcadia, CA 91007

Porter Law Group, Inc.  
7801 Folsom Blvd., Suite 101  
Sacramento, CA 95826

Robinson & Robinson, LLP  
2301 Dupont Drive, Suite 530  
Irvine, CA 92612-7502

Shady Bird Lending, LLC  
c/o Law Offices of Geoffrey Long  
1601 N. Sepulveda Blvd., No. 729  
Manhattan Beach, CA 90266

Splinter & Thai, LLP  
25124 Narbonne Ave., Suite 106  
Lomita, CA 90717-2140

**Top 20 Unsecured Creditors:**

Newgens, Inc.  
14241 Foster Rd.  
La Mirada, CA 90638

Cabrillo Hoist  
P.O. Box 3179  
Rancho Cucamonga, CA 91729

WESCO Distribution Inc.  
6251 Knott Ave.  
Buena Park, CA 90620

Harbor All Glass & Mirror, Inc.  
1926 Placentia Ave.  
Costa Mesa, CA 92627

Diablo Consulting  
13200 Crossroads Parkway N  
Ste. 115  
City of Industry, CA 91746

Ace Tek Roofing Co.  
747 S. Ardmore Ave., Suite 405  
Los Angeles, CA 90005

Morrow Meadows  
231 Benton Court  
City of Industry, CA 91789

Chefs Toys  
18430 Pacific Street  
Fountain Valley, CA 92708

Stumbaugh & Associates, Inc.  
3303 N. San Fernando Blvd  
Burbank, CA 91504

HBA Procurement, Inc.  
3216 Nebraska Ave.  
Santa Monica, CA 90404

OJ Insulation LP  
600 S Vincent Ave.  
Azusa, CA 91702

DKY Architects  
15375 Barranca Pkwy.  
Suite A-210  
Irvine, CA 92618

Master Glass  
2225 W. Pico Blvd, Unit C  
Los Angeles, CA 90006

Universal Flooring Systems  
15573 Commerce Lane  
Huntington Beach, CA 92649

L2 Specialties  
3613 W. Macarthur Blvd., #611  
Santa Ana, CA 92704

Ficcadenti Waggoner  
16969 Von Karman Avenue  
Suite 240  
Irvine, CA 92606

Retrolock Corp  
17915 Railroad Street  
City of Industry, CA 91748

American Engineering Laboratories Inc.  
PO Box 1816  
Whittier, CA 90609